



Modern Slavery Statement

20 24



UNSW
SYDNEY

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Acknowledgement of Country

We acknowledge the Bidjigal, Gadigal, Ngunnawal and Ngambri Peoples, who are the Traditional Custodians of the unceded territories upon which our campuses are located.

We pay our respects to First Nations Elders past and present for their custodianship of Country. We celebrate the cultural stories, songlines, ancestors and dreamings of Aboriginal and Torres Strait Islander Peoples, the First Peoples of Australia.

We acknowledge that First Nations Peoples in Australia have survived practices that today we call modern slavery including forced labour, segregation, sexual exploitation and child labour. Our [Indigenous Strategy](#) supports our commitment to truth-telling and delivering positive outcomes for Indigenous education, employment and research.

Vice-Chancellor's Message

2024 marked an extraordinary milestone for UNSW Sydney. **We proudly celebrated 75 years of delivering outstanding education, teaching and research for our community.**

Our achievements are driven by our incredible network of students, staff, alumni, partners and the University Council. We continue to pursue our mission of transforming lives in Australia and around the world by harnessing the transformative potential of research and education to enable progress for all.

UNSW Sydney is uniquely placed to address the global challenge of modern slavery through multidisciplinary collaboration, teaching and research.

Throughout 2024, we made steady progress against our Modern Slavery Strategy and implemented initiatives throughout our supply chain and operations to drive incremental and meaningful change.

2024 Program Highlights:

- Revised our procurement high-risk evaluation framework for requests for proposal to include heightened due diligence considerations on sustainability pillars and applied the framework for two core high risk tenders
- Achieved "Corporate Ethical and Procurement Supply Status" from the Chartered Institute of Procurement and Supply for the fifth consecutive year
- Engaged our students to raise awareness of modern slavery through O-Week and held consultations with international students through our Psychology & Wellbeing team
- Committed to the Ten Principles of the United Nations Global Compact, becoming a member of the UN Global Compact Network Australia and
- Developed our first ESG risk profile with identified risks and relevant internal controls across student experience, research, investments, fundraising and third parties.



We focused on greater engagement with our suppliers to improve visibility of shared risks. We also shared our experience of implementing best practice standards of sustainable procurement to peers within, and external to, the Higher Education sector.

While we are proud of our achievements to date, we recognise the need to continually address our growing global risks. Looking to 2025, we will continue to strengthen our initiatives and governance framework to protect human rights and drive societal impact.

Our 2024 Modern Slavery Statement addresses the mandatory reporting criteria under the Modern Slavery Act 2018 (Cth) and was approved by the University Council on **2 June 2025**.

Professor Attila Brungs
Vice-Chancellor and President

01 Who we are

Founded in 1949, the University of New South Wales (UNSW Sydney) is a research-intensive university known for innovation and global impact. Our defining vision to improve lives in Australia and around the world is driven by our strategic objective – **Progress for All**.

Our structure and operations

We are a body corporate established by the University of New South Wales Act 1989 (NSW), and an accredited higher education provider under the *Tertiary Education Quality and Standards Agency Act 2011* (Cth).

The University Council serves as the principal governing body and acts to advance our objectives and interests. The University Council consists of members with diverse perspectives across different areas including law, finance, governance and management.

Our Modern Slavery Working Group oversees our anti-slavery initiatives including progress against our Modern Slavery Strategy and management of risks. The Working Group includes subject matter experts from key business units across the University including Strategic Procurement, Treasury, IT, Research Services, Risk, Facilities Management, Legal & Compliance and Conduct & Integrity.



Top 20 worldwide

QS World University Rankings, 2025



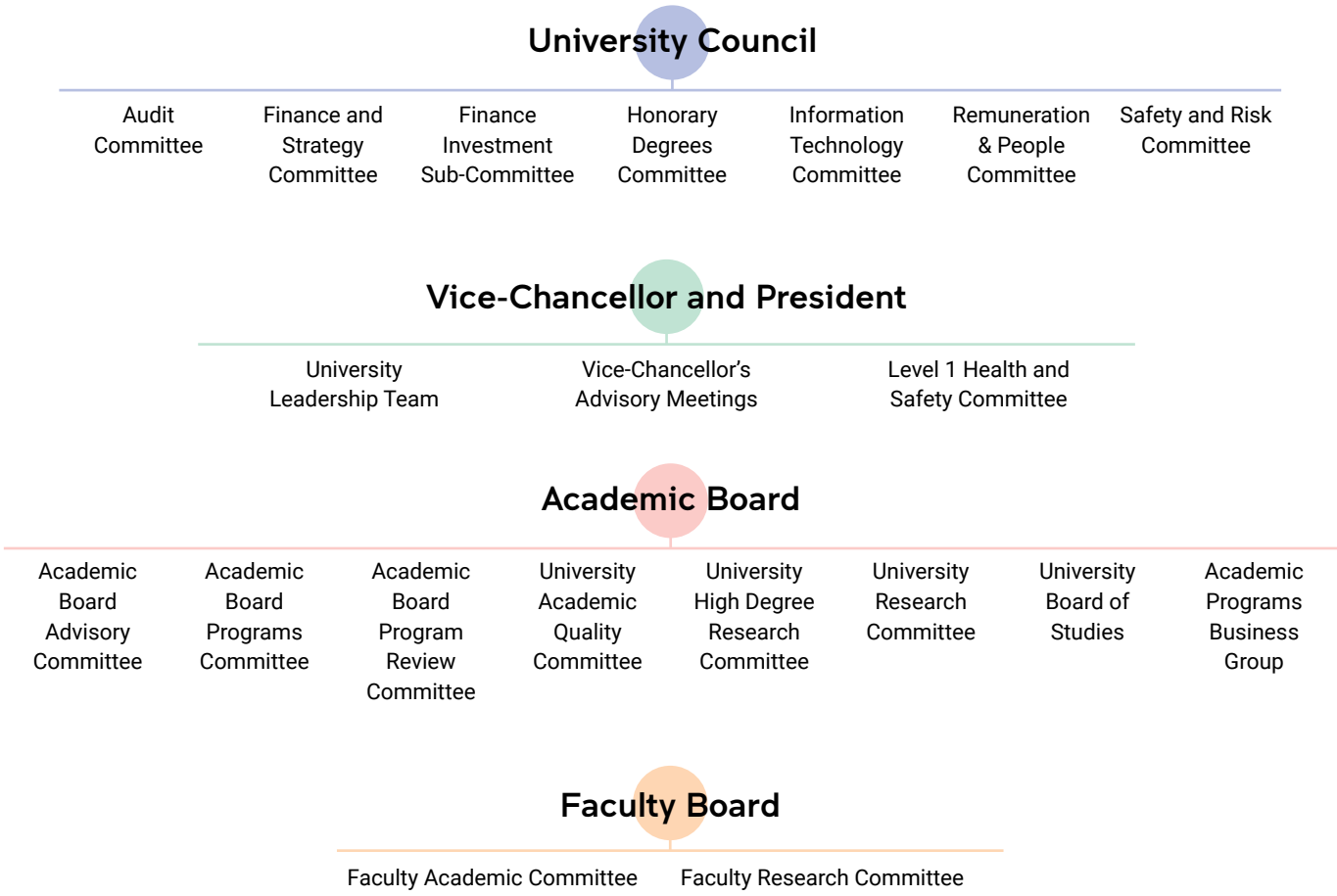
Top 10 worldwide

Overall Ranking – Times Higher Education Sustainable Development Goals, 2024



2nd in Australia

Australian Research Council 2025 Discovery Projects (\$41M, 61 grants)



Members of our Modern Slavery Working Group and senior leaders across the University have been involved in the review of our 2024 *Modern Slavery Statement*.

In delivering world class education to our students, we also maintain our long-held tradition of research and sustained innovation focusing on areas critical to our future. In 2024, we received \$118M in research funding from the National Health and Medical Research Council with our wider research strengths rooted in biomedical sciences, defence, environmental sustainability, fundamental and enabling sciences and next generation materials and technologies. We also maintain infrastructure to support our research activities including the Mark Wainwright Analytical Centre, Research Imaging NSW, Network Labs and shared research facilities that can be used by our researchers.

Our faculties and schools are known for their multi-disciplinary approach to research and education. Our work is supported by 7 faculties, 45 schools, 8 divisions and over 56 centres and institutes including:

Faculties	Divisions
Arts, Design & Architecture	Academic Quality
Business	Education & Student Experience
Engineering	Global
Law & Justice	Indigenous
Medicine & Health	Operations
Science	Research & Enterprise
UNSW Canberra	Societal Impact, Equity & Engagement
	Transformation, Planning & Assurance

Our community

Across all our campus locations within Sydney and regional New South Wales (NSW), we embrace a strong sense of community and inclusion with a commitment to ongoing sustainability.

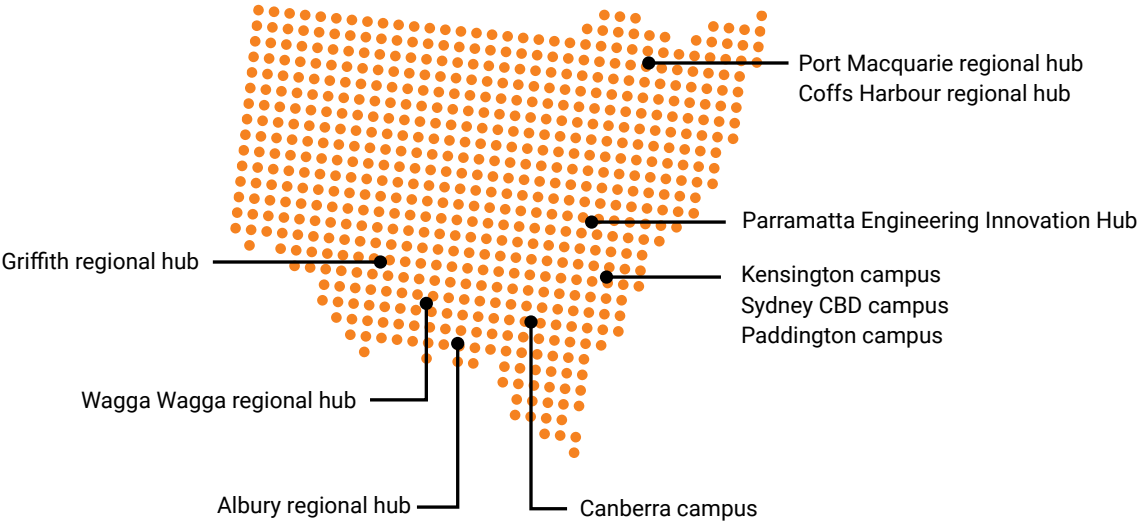
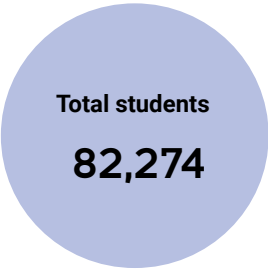


Figure 1: Map of locations



	Female	Male	Other
Commencing 2024	17,318	19,808	33
Local students	19,826	23,936	78
International students	17,827	20,593	14
Higher degree research	2036	2375	14



	Female	Male	Other
Academic	1525	2074	17
Professional	3068	1635	10
Full time	3614	3197	18
Part time	974	506	9
Permanent	2397	1923	9
Fixed term	2200	1783	18
Casual	8643 casual staff*		

*Headcount from 2023 submission for Transforming the Collection of Student Information (TCSI) data. The 2024 casual data headcount will be available in 2025.

Figure 2: Staff and Student Data as at 31 March 2024



11
residential colleges



3900+
beds on campus



Over
300
student clubs
and societies



380,000+
global alumni network

Controlled Entities

UNSW Sydney has established controlled entities to support its philanthropic activities and commercial functions.

Controlled Entity	Incorporated in
Horizons Future Learning Pty Ltd (trading as “Mentem”) <i>Workforce upskilling</i>	Australia
New South Innovations Pty Ltd (NSI) <i>Intellectual property management and commercialisation</i>	Australia
Qucor Pty Ltd <i>Intellectual property management and commercialisation</i>	Australia
Scientia Clinical Research <i>Clinical trials</i>	Australia
The University of New South Wales Foundation Ltd <i>Philanthropy and donations</i>	Australia
Trustee for: The University of New South Wales Foundation The NSW Minerals Industry/University of New South Wales Education Trust	
University of New South Wales Press Ltd <i>Press and publications</i>	Australia
UNSW Global Pty Ltd (trading as “UNSW College”) <i>Teaching including in China, Thailand, Indonesia, Japan and South Korea</i>	Australia
UNSW Centre for Transformational Environmental Technologies Co Ltd <i>Intellectual property development and commercialisation</i>	China
UNSW Sino-Australia Innovative Technology & Education Co Ltd <i>Intellectual property development and commercialisation</i>	China
UNSW Hong Kong Ltd <i>Promotion and recruitment</i>	Hong Kong
UNSW Hong Kong Foundation Ltd <i>Philanthropy and donations</i>	Hong Kong
UNSW Global India Pvt Ltd <i>Promotion and recruitment</i>	India

Our Supply Chain

We continue to partner with a diverse supplier network worldwide to deliver worldclass education and research to our community while supporting our infrastructure and commercial functions.

In 2024, we experienced a 13% increase in our total strategic procurement spend when compared to 2023. We also increased our spend with Indigenous suppliers by 80% in 2024 – this has been driven by our Defence Indigenous Spend targets and supported by our Sustainable Procurement Framework.

Our strategic procurement spend is tracked through categories to enable transparency and targeted risk management where required. Our 2024 spend data is highlighted below alongside the top three goods or services we purchased in each category. The percentage values listed below reflect the University's dollar spend value in each category.



888.5 million

total strategic procurement spend



6053 suppliers

over 90 countries



\$2.7 million directed to

50 Indigenous suppliers

Corporate - 31%

1525 suppliers

1. International student recruitment
2. HR & workforce services
2. Business and management consulting services

Estate Management - 26%

699 suppliers

1. New build works
2. Refurbishment works
3. Electricity usage

Technology - 24%

410 suppliers

1. IT consultancy services
2. Teaching & research software
3. Cloud services

Research, Medical, Equipment and Consumables - 13%

839 suppliers

1. Scientific equipment
2. Research services
3. Laboratory consumables

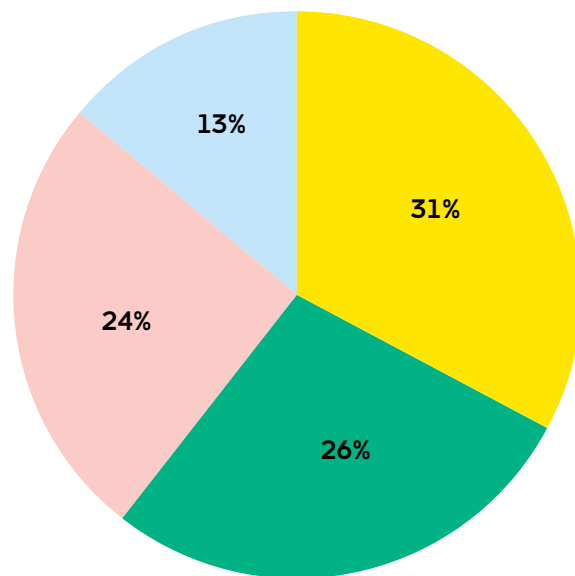


Figure 3: UNSW Sydney's Spend Data by Procurement Category and Distribution

*The list above excludes 2586 suppliers that have not yet been classified into a specific spend category.

Category Spotlight:

Spend on HR & Workforce Services

As a global university, we recognise our responsibility to contribute positively to the community through research and education. To meet our strategic goals, we engage consultants to provide human resources contract management services for staff located overseas. Our spend for this service increased in 2024, moving spots in the Corporate category from third to second when compared to 2023.

This year, we ran a tender to shortlist suppliers for offshore staff contract management services. Within this industry, we identified several modern slavery risks, including potential lack of compliance with labour laws. To improve visibility of these risks, the tender was given a heightened Sustainability evaluation rating and included robust assessments of supplier responses by the Sustainable Procurement Manager. Shortlisted suppliers were asked additional questions to demonstrate their compliance with local labour laws and principles listed in the University's Supplier Charter alongside:

- grievance mechanisms and related procedures for staff,
- details of the supplier's subcontracting policies and
- vetting processes for subcontractors.

The selected suppliers provided highly satisfactory responses to the questions and demonstrated evidence of effective due diligence processes in place to reduce overall risks of modern slavery within their supply chain.



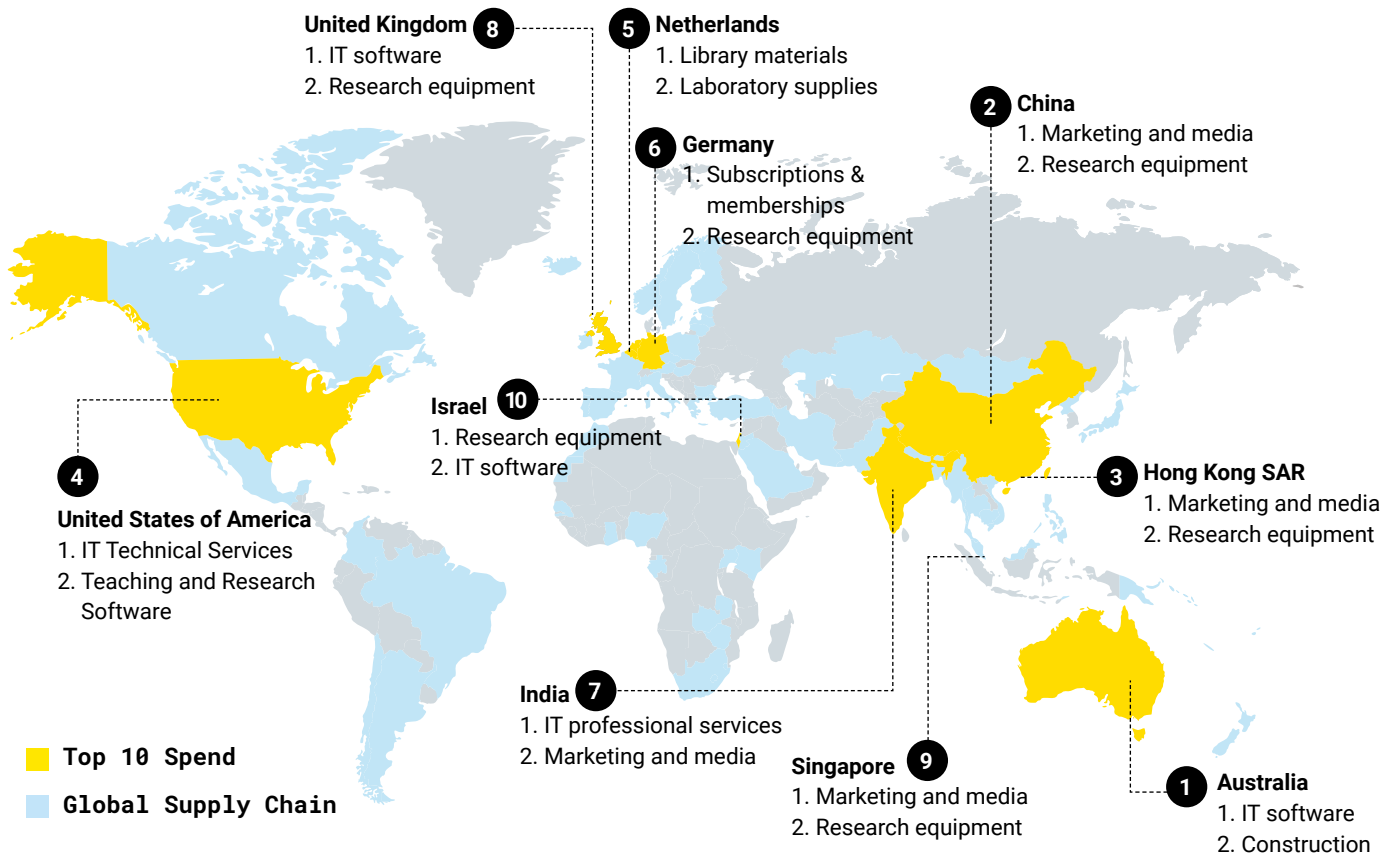


Figure 4: UNSW Sydney's Global Supply Chain

Top 10 Countries

	Country	Spend	Modern slavery prevalence rate by country*	# of UNSW Suppliers
1	Australia	\$748.8M	1.6 per 1000	4620
2	China	\$35.1M	4.0 per 1000	73
3	Hong Kong SAR	\$18.8M	2.8 per 1000	36
4	United States of America	\$7.3M	3.3 per 1000	272
5	Netherlands	\$7.3M	0.6 per 1000	17
6	Germany	\$6.6M	0.6 per 1000	51
7	India	\$6.3M	8.0 per 1000	17
8	United Kingdom	\$4.2M	1.8 per 1000	91
9	Singapore	\$3.69M	2.1 per 1000	28
10	Israel	\$3.62M	3.8 per 1000	11

Table 1: UNSW Sydney's Top 10 Countries Categorised by Highest Spend

* The data in Table 1 has been mapped to the Walk Free Global Slavery Index, which maps the prevalence of modern slavery per 1000 people in each country. The prevalence rate by country provides insight of the modern slavery risk intensity of our supply chains based on the prevalence in our highest spend countries. Combined with our knowledge of our highest risk industries, we plan to engage with specific suppliers for risk mitigation and deep dives – starting with our highest spend.

02 Our Modern Slavery Risks

Supply chain risks

In 2023, we completed an independent materiality risk assessment of our supply chain against ESG pillars. This assessment evaluated our strategic procurement spend and:

- evaluated our Tier One suppliers for social risks, modern slavery risks, violations of labour rights and resulting impacts on workers and communities and
- provided a clear foundation of areas of concern and the effectiveness of our mitigation strategies.

Our cross functional team (including expertise from Strategic Procurement, Risk and Legal & Compliance alongside the Modern Slavery Working Group) continued to map the material risks identified in our assessment against our 2024 spend by using the Australian Universities Procurement Network (AUPN) anti-slavery dashboards. We have determined that the risk types identified in 2023 remain the same for 2024, whilst the intensity is relative to the growth of our operations and annual spend.

As a university with global reach, we cultivate partnerships with industry, universities, government and communities to lead innovation. Our suppliers are vital to our strategic goals, with our strategic procurement aimed at delivering sustained impact and value in all we do. In Table 1 below, we have highlighted our top ten categories of spend including their modern slavery risk ratings as per the AUPN taxonomy.

	AUPN Category	Spend	Spend Country	Risk
1	Information Technology	\$139M	AU, IN, US	High
2	Student Recruitment	\$110M	CN, AU, HK	Medium
3	New Build Works	\$54M	AU	High
4	Scientific Equipment	\$39M	AU, CN, IL, DE	High
5	Teaching and Research Software	\$39M	AU, US	High
6	Refurbishment Works	\$33M	AU	High
7	HR and Workforce Services	\$21M	AU, NZ	Low
8	Electricity Usage	\$19M	AU	Medium
9	Business and Management Consulting Services	\$18M	AU, HK, UK	Low
10	Commercial Cleaning	\$16M	AU	High

Table 2: 2024 Modern Slavery Risks in Our Supply Chain by AUPN Category

In analysing the data in Table 2, we identified certain industries where UNSW Sydney is at risk of contributing to modern slavery. These risks are outlined below and the actions we took to address some of our risks are outlined in Section 3.



This year, we worked with 242 suppliers to procure scientific equipment and lab consumables. While this allows us to meet our teaching and research goals, our modern slavery risks within this industry include **poor labour rights, human trafficking and child labour**.



We partnered with 13 suppliers for our new build works across 2024. While all our suppliers for this category are based in Australia, our materiality risk assessment highlighted **poor labour rights** as a key modern slavery risk.



We work with 10 suppliers for commercial cleaning across our campuses to provide a safe working for our community. We recognise the risks of **poor labour rights** and **forced labour** occurring within this industry. In 2024, we reviewed our approach to engaging with commercial cleaning suppliers to address our risks – further details can be found on page 17.



Operational Risks

Vulnerability of International Students

Our student cohort grew by 16% from 2023 with a diverse community of over 43,000 international students from over 100 countries. We recognise our students are at greater risk of experiencing modern slavery, both in Australia and overseas. These risks materialise for international students who:

- come from non-English speaking backgrounds,
- may not have support networks of family or friends,
- have limited access to resources about their labour rights or
- are not aware of available grievance mechanisms to speak up about their experiences.

These vulnerabilities can lead to tolerance of abuse, risky or unsafe work, underpayment of wages or intimidation and threats from employers. From our Speak Up campaign to our student support services, the initiatives we implement to raise awareness for students is underpinned by our Modern Slavery Strategy. We have also designed our initiatives to address the NSW Anti-slavery Commissioner's notification about the vulnerability of international students to modern slavery as a significant issue under the Modern Slavery Act 2018 (NSW).

Investments

As a university, our global influence is partly driven by our investment decisions. Our Responsible Investment Framework integrates best practice environmental, social and governance principles within our investment activities. In 2024, we commissioned a report of ESG risks (including modern slavery) linked to our investments from our external fund managers. The report was informed by the Sustainability Accounting Standards Board's Materiality Finder and outlined which of our securities presented modern slavery risks, categorised by industry and country.

The scores are based on risks in supply chain management, labour rights, health and safety standards and business ethics that are prevalent within the industry or country. The following industries represent material modern slavery risks within our investments:



Air Freight and Logistics rely on large and complex third-party networks with independent contractors. Modern slavery risks generally arise from poor work rights within the workplace, underpayment of workers, practices of forced labour, and a high rate of injuries and fatalities within workplaces due to poor health and safety practices.



Biotechnology and Pharmaceuticals present several risks to human rights within our investment portfolio. These risks include subcontracting clinical trials to third-party research organisations that may have material issues in business ethics like fraud, abuse and lack of safety for clinical trial participants.



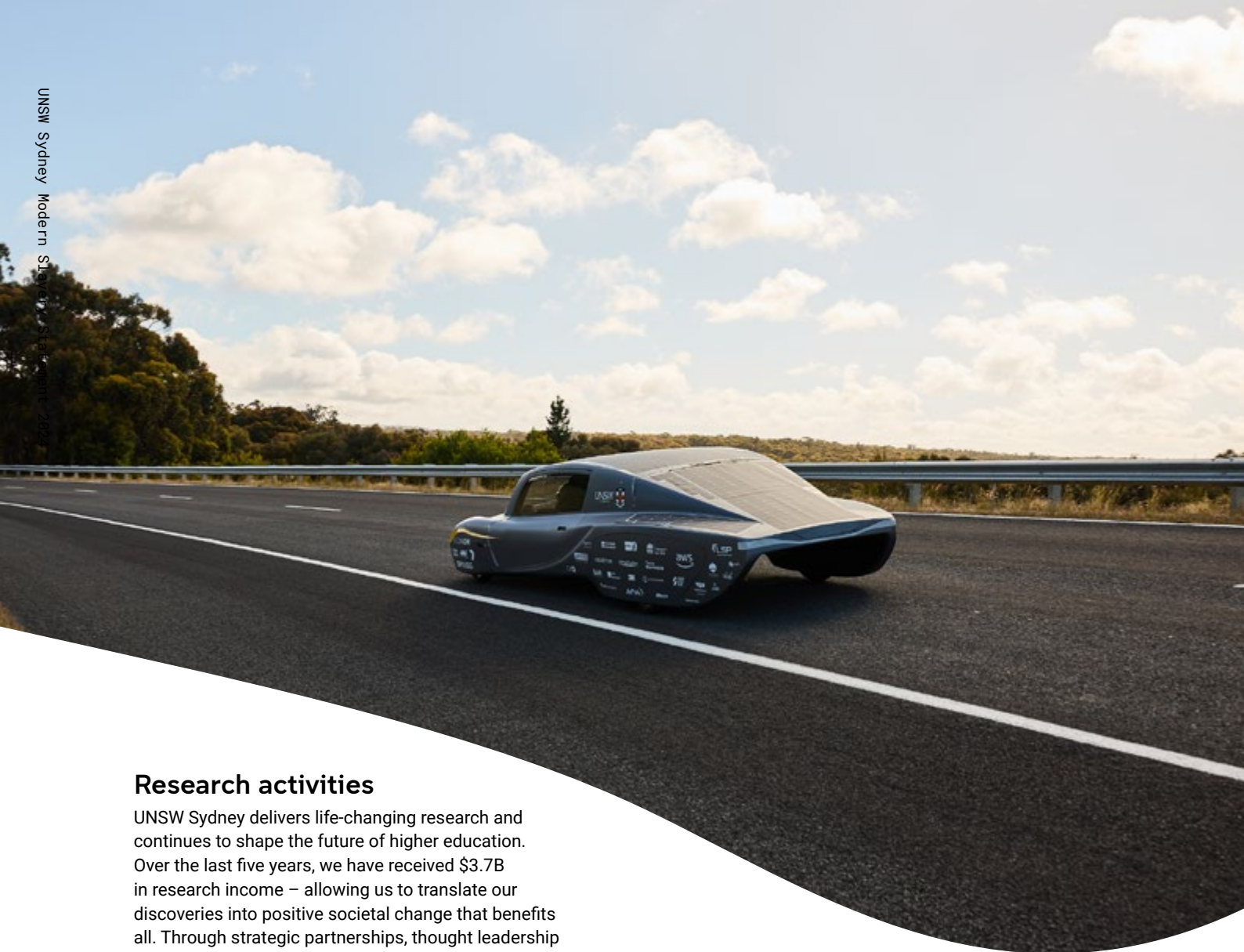
Food Retailers and Distributors represent over half our top 10 investments that represent highest modern slavery risks. Workers in this industry may be exposed to forced or bonded labour (including passport retention or deceptive recruitment).

Controlled Entities



From teaching to clinical trials, we have a network of 13 controlled entities that enable us to fulfil our functions and goals as a university. While we initially aimed to work with our controlled entities to complete assessments and training to reduce their modern slavery risks, our 2024 focus shifted to reviewing governance structures and winding up some entities. We plan to restart the process of risk identification and mitigation with our controlled entities in 2025.





Research activities

UNSW Sydney delivers life-changing research and continues to shape the future of higher education. Over the last five years, we have received \$3.7B in research income – allowing us to translate our discoveries into positive societal change that benefits all. Through strategic partnerships, thought leadership and engagement with decision-makers, we are determined to tackle real-world problems that effect sustainable development.

The risks linked to our research activities include:



In 2024, our spend for Research and Teaching included **\$123M with 839 suppliers**. As our research strengths are diverse, we recognise the risk of purchasing equipment and materials for research increases our risk of contributing to human rights abuses. We partner with suppliers to procure lab consumables as well as medical and scientific equipment for our research activities. Sourcing raw materials to produce these goods is known to carry modern slavery risks, including child labour and forced labour.



UNSW Sydney collaborates with local and international partners to maximise our research impact. This includes research and development and collaborations with leading universities and corporations as well as overseas entrepreneurs and investors, such as through the TORCH Innovation Precinct. Though our partnerships are diverse, modern slavery risks arise when:

- collaborations occur in countries with higher prevalence rates of modern slavery,
- a partner demonstrates poor business ethics or lack of transparency in their supply chain or
- the possibility of our research being used within value chains that are known to use forms of slavery (like forced labour).

03 Addressing our risks

We continually review and strengthen our approach to mitigating our modern slavery risks within our sphere of influence. Our Modern Slavery Strategy and Action Plan underpins our actions and enables us to integrate strong governance and risk management into our supply chain and operations.

Our Action Plan brings together stakeholders from across the University and is grounded within three strategic pillars:



**Strong Governance
and Effectiveness**



**Embedded
Risk Management**



**Remediation
and Reporting**

Actions for our supply chain

Sustainable

Procurement Framework

UNSW Sydney is committed to using its buying power to generate social value that extends beyond the value of the goods and services we procure. Our [Sustainable Procurement Framework](#) (SPF) was launched in 2024, with endorsement from our University Leadership Team, to deliver outstanding environmental, social and economic benefits to our community.

Since its launch, the SPF has driven awareness amongst our staff and suppliers about risk hotspots and opportunity areas across Environmental Sustainability, Modern Slavery and Social Procurement and driven outcomes across these three areas. The SPF has also aligned strategic sourcing processes with our Societal Impact vision and Environmental Sustainability targets. Achievements under our SPF are further detailed in Section 3 – Address our Risks.

Supply Chain Visibility: 2024 Actions



- Implemented sustainable risk management plans for select Medium to High Risk suppliers across the Corporate, Estate Management and Research Medical Equipment and Consumables categories
- Updated our Finance Policy and Procurement Manual to include specific considerations around Environmental Sustainability, Modern Slavery and Social Procurement
- Provided training for the Strategic Procurement team on how to evaluate supplier responses and when to escalate to the Sustainable Procurement Manager for certain evaluations
- Reviewed and updated the University's Supplier Charter to drive ethical and sustainable procurement practices within our supply chain
- Commenced training for our top 100 strategic suppliers (by spend) and contract managers on the updated principles within the new Supplier Charter
- Updated the University's Sustainable Procurement webpage to host guidance documents and updates on initiatives



- Commenced market review for a platform to track the University's supply chain performance and activities in relation to ESG pillars including modern slavery and environmental sustainability



- Reached out to 25 strategic suppliers rated “Medium-High” or “High” risk within the ESG materiality risk assessment with a deep dive questionnaire to gain an understanding on certain risks and what actions have been implemented to mitigate those risks
- Redesigned tender process for high risk commercial cleaning and security projects to include category and sector risk due diligence reviews and tailored, industry specific questions relating to modern slavery and labour rights
- Added additional questions to Request-for-Procurement (RFP) templates for high-risk categories such as lab consumables, offshore marketing and payroll
- Created an internal procedure for suppliers who do not provide evidence of sufficient mechanisms to mitigate modern slavery risks – these suppliers are followed up by the responsible Procurement Manager to provide additional information to support their response as part of the RFP evaluation process
- Embedded KPIs and contract clauses relating to anti-slavery measures into contracts for high impact projects based on identified improvements areas, collaborating with suppliers
- Conducted a joint project through the University Procurement Hub with a Group of Eight university to conduct sustainability workshops with both universities’ top 7 lab consumables suppliers
- Gathered information on each supplier’s emissions, green product offerings, product country of origin and supply chain anti-slavery actions to inform joint supplier relation management plans

2025 priority:

Improve supplier relationship management processes to track and monitor progress towards targeted improvement areas

Case Study

Commercial Cleaning Tender

This year, we issued a tender for **commercial cleaning services** for our Kensington campus. As part of our standard approach during the RFP process for Sustainable Procurement, we conduct due diligence on potential suppliers’ labour rights policies and procedures. We recognise this is especially important for high risk service industry procurement projects.

Given the inherent labour rights risks in the cleaning services industry, we implemented our high risk RFP evaluation framework for this tender. This included:

- heightened modern slavery evaluation weighting for the RFP and
- tailored questions to evaluate suppliers in relation to compliance with labour laws, subcontracting agreements and policies and whistleblowing mechanisms available for their staff.

The University also held in-person interviews with shortlisted suppliers with the Sustainable Procurement Manager in attendance to evaluate responses. Suppliers were asked specific questions relating to identified gaps within their RFP responses.

Suppliers were also interviewed about their environmental sustainability practices to ensure alignment with the University’s broader sustainability goals.

Actions for our Operations

Governance and Due Diligence: 2024 Actions



- Updated the Modern Slavery Prevention Policy to reflect the United Nations Guiding Principles on Business and Human Rights which was endorsed by the University Leadership Team and approved by the Vice-Chancellor
- Committed to the United Nations Global Compact in August 2024 and now a [member](#) of the United Nations Global Compact Network Australia
- Included human rights and modern slavery awareness within the *Working@UNSW* training module, which was released in November 2024 to all staff and aligns with the University's Code of Conduct & Values



- Integrated ESG risk management within our revised [Risk Management Manual](#)



- Assessed and managed a complaint of poor working conditions (including lack of an anonymous complaints portal) from a worker in our Tier One supply chain. Legal & Compliance issued advice to the contract manager which resulted in the supplier creating a grievance management policy and system for their staff
- In late 2024, we received a complaint through the SpeakUp portal from a University employee. The complaint was classified as modern slavery by the employee and was referred to our internal Employee Relations team for investigation
- Developed a standard operating procedure to review, assess and remediate reports of modern slavery as received through the SpeakUp portal
- Completed tailored training for the Conduct & Integrity team to manage complaints about modern slavery when they are received through the SpeakUp CMS
- Legal & Compliance continued to partner with the Division of Research & Enterprise to issue advice where due diligence reports noted reports of forced labour within prospective partner's supply chain or operations

2025 priority:

Develop role specific sustainability training modules for relevant roles (e.g., contract managers and complaints investigators)

Actions for our Operations

Risks to Students: 2024 Actions

In October 2023, the NSW Anti-slavery Commissioner raised the vulnerability of international students as a significant issue to public universities under the Modern Slavery Act 2018 (NSW). We continued to prioritise mitigating this risk in 2024 and undertook the following actions to raise awareness.



- Commenced work in late 2024 to create factsheets with information about legal and mental health support programs for students who raise reports about modern slavery with the University's Conduct & Integrity Office
- Maintained our online hub for international students with information on work rights, visa conditions, accommodation and how to access mental health support. This hub aligns with the Education for Overseas Students Act 2000 (Cth) and Standard 6 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018



- Reviewed our study abroad agreements and drafted stronger anti-exploitation clauses for high risk countries where modern slavery is prevalent in line with Walk Free's Global Slavery Index
- Strategic Procurement and Legal & Compliance hosted a student group for work experience. The student group represented six faculties across the University and learned about the University's approach to Sustainable Procurement and its Modern Slavery Strategy



- Partnered with the Australian Red Cross to review the Work Right Hub and its suitability for international students in Australia. This work included consultations between the Psychology & Wellness team and groups of international students to review content

2025 priority:

Continue to raise awareness of modern slavery within our student cohort

Term 3 O-Week

The UNSW SpeakUp Strategy ensures our community knows the expected behaviours and how to speak up when needed. The SpeakUp Strategy covers several unacceptable behaviours including:

- Fraud and corruption,
- Cheating and plagiarism,
- Discrimination, bullying or harassment,
- Foreign government interference,
- Modern slavery,
- Racism or religious vilification or
- Research misconduct.

In 2024, the Conduct & Integrity team held its first stall at the Term 3 Orientation Week to directly engage with local and international students. The Term 3 O-Week received foot traffic of over 45,000 students, with several students engaging with the campaign and learning when and how to report their concerns.

04

Effectiveness of Actions

UNSW Sydney is committed to continuous monitoring of our anti-slavery actions to ensure we implement sustainable progress. Together with our Sustainable Procurement Framework, the Modern Slavery Strategy is built on principles of strong governance and effectiveness to ensure we track our progress. Our long term goals and 2024 impact areas for our supply chain and operations are outlined below.

Supply Chain

Long Term Goal	Impact
Align supply chain actions to the University's broader ESG processes and objectives	- Received "Corporate Ethical Procurement and Supply" accreditation from the Chartered Institute of Procurement and Supply for the fifth consecutive year - Updated the Supplier Charter to include a new "Responsibilities for Ethical Conduct" section which enables suppliers to commit to revised WHS, Environmental Sustainability, Anti-Slavery and diversity and inclusion principles
Formalise end-to-end risk assessment and management process	- High risk procurement framework implemented for two priority suppliers in Estate Management (Cleaning and Security) - The University is a member of the Cleaning Accountability Framework, a worker-driven organisation that aims to improve labour and compliance conditions with cleaning vendors
Engage with strategic suppliers to raise awareness and remediate risks	- Partnered with the University Procurement Hub (UPH) to run a joint supplier engagement project with another public University to better understand the risk mitigation actions of our shared suppliers for lab consumables - Through the UPH project, we have run sustainability workshops to engage with each supplier individually and identify action areas to focus on as part of the ongoing relationship - As part of our work to engage 25 strategic suppliers (see page 14), we identified one core supplier in a sector with inherently high modern slavery risks that required additional support from the University to complete their questionnaire. We held an in-person workshop with the supplier to explain the process which resulted in a completed questionnaire with input from multidisciplinary teams



Operations

Long Term Goal	Impact
Align Modern Slavery Strategy to the University's broader ESG processes and objectives	- Design of a new ESG Advisory Committee is underway to ensure all anti-slavery initiatives align to the University's ESG actions, reporting obligations and commitments - From 2025, milestone reporting against the Strategy and Action Plan will be directed to the UNSW Equity Diversity and Inclusion Board with input to the new ESG Advisory Committee to ensure actions align with broader sustainability goals
Strengthen Enterprise Risk Framework to include human rights considerations	- Revised Risk Management Manual now specifically addresses sustainability and human rights risks - The University's Risk team also completed an ESG risk profile with identified controls across student experience, research, investments, fundraising and third parties
Ensure awareness of key leaders on modern slavery	- Bespoke training and awareness sessions rolled out to the Strategic Procurement, the IT Leadership Team and Conduct & Integrity - New mandatory <i>Working@UNSW</i> online training module rolled out to all staff (including casuals) which includes training on the University's human rights commitments - Work underway to develop an engagement plan for high risk controlled entities and commence risk identification of their supply chain and operations
Ensure our community can access our grievance systems	- SpeakUp portal now includes modern slavery as a category for reports with a standard operating procedure in development to manage receipt and investigation of reports - In 2023, we received an anonymous complaint from a worker in our Tier One supply chain. This complaint was investigated and resolved by the contract manager in 2024 - In late 2024, we received an internal complaint that was categorised as modern slavery by the complainant. This report is currently with the Employee Relations team for investigation

Case Study

Security Services Tender

In 2024, we issued a tender for security services for our Kensington campus. During our market research phase, we found resourcing within the security industry has largely recovered following COVID-19 however, there are still risks of poor labour rights and worker exploitation present.

As with our tender for commercial cleaning services, we implemented our high risk RFP evaluation framework for the security services tender. We applied heightened weightings for both Sustainability and Modern Slavery within the RFP with a goal to choose a supplier who:

- provides a healthy and safe working culture for staff,
- consistently monitors for and manages modern slavery risks within their operations,
- recognises and provides development opportunities for staff and
- aligns with the University's values.

Shortlisted suppliers demonstrated a strong response to anti-slavery initiatives and responded to RFP questions. These suppliers provided evidence of effective human rights and whistleblowing policies, detailed risk identification maps and internal controls to address risks when they arise.

Each shortlisted supplier was interviewed by the evaluation panel to understand what processes they had in place to effectively manage their risks and address gaps within their responses to the RFP.

Following our comprehensive evaluation, we selected a supplier who demonstrates:



A well-established approach to anti-slavery initiatives with no subcontracting procedures and hiring direct employees only



A proactive approach to safety and risk management including access to accredited security risk assessment tools developed through the UNSW Founders Program



An executive team who has a mature understanding of higher education including risks of gendered violence, risks to mental health and importance of diversity and inclusion



Ongoing training and development for staff around threat identification, service excellence and assessing risks

Our work for this tender and partnership with the selected supplier shows how effective anti-slavery initiatives and shared commitments can effectively address risks across sectors.



05 Engagement

External Engagement

Throughout 2024, the Strategic Procurement team presented to various external partners on the University's Sustainable Procurement Framework and Roadmap. Our presentations included insights into our actions to address challenges and opportunities for anti-slavery initiatives, social procurement and environmental sustainability.

The events were hosted by the Chartered Institute of Procurement & Supply in March 2024 and the Commonwealth Bank of Australia in April 2024. Both events enabled us to network and share best practices with procurement professionals and sustainability experts from across various public and private industries. In both our presentations, we highlighted the importance of cross sector collaborations to share experiences and opportunities for growth.

Higher Education Engagement

This year we had the privilege of engaging with our sector in different forums including:

- a meeting with the NSW Anti-slavery Commissioner hosted on our campus to discuss sector risks, challenges and opportunities,
- a workshop with Professor Tomoya Obokata, the United Nations Special Rapporteur on Contemporary Forms of Slavery. During this workshop, we participated with colleagues from across Higher Education to inform Professor Obokata's country visit to understand the extent of slavery in Australia and review sector specific actions to address these practices
- the AUPN Procurement Leaders Workshop which included 60 representatives from 31 universities, including a session on the University Anti-Slavery Program and
- the NSW Anti-slavery Commissioner's inaugural online Anti-Slavery Forum.

Acknowledgments

UNSW Sydney's 2024 Modern Slavery Statement was drafted with input from our Modern Slavery Working Group, experts from the Strategic Procurement, Risk and Legal & Compliance teams, University Leadership Team and University Council.

Our 2024 Modern Slavery Statement also covers our controlled entities. Although our controlled entities were not reporting entities as defined under the Modern Slavery Act 2018 (Cth) in 2024, we recognise their supply chains and operations increase the University's overall risk of contributing to modern slavery. We look forward to kickstarting the process of modern slavery risk identification and mitigation for our controlled entities in 2025.

UNSW Sydney proudly acknowledges and is grateful for the following partners for their continued engagement with the Higher Education sector:

- Australian Human Rights Institute,
- Australian Universities Procurement Network,
- Cleaning Accountability Framework,
- Electronics Watch and
- Office of the NSW Anti-slavery Commissioner.

This engagement is instrumental to drive our collective approach to anti-slavery initiatives forward and championing the protection of human rights.

